

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

CHRISTOPHER DOYLE, LPC, LCPC, *
*
Plaintiff, *
*
v. * Civil Action No. 1:19-CV-00190-DKC
*
LAWRENCE J. HOGAN, JR, *et al.* , *
*
Defendants. *

**MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT
AND MOTION FOR PRELIMINARY INJUNCTION**

The defendants, Lawrence J. Hogan, Jr., Governor, and Brian E. Frosh, Attorney General, move for an extension of time to file their responses to the plaintiff's complaint and motion for a preliminary injunction and, as reasons, state:

1. The plaintiff, Christopher Doyle, LPC, LCPC, served his lengthy complaint on January 25, 2019. Included with the complaint are 150 pages of exhibits and a lengthy motion for a preliminary injunction.

2. Responses to the complaint and the motion will require extensive research, review of legislative materials, the exhibits to the complaint, and other materials related to conversion therapy, and other investigative tasks.

3. The undersigned counsel for the defendants requested a month's extension of time to respond to both of plaintiff's filings. The plaintiff's counsel agreed not to oppose a three-week extension of time to respond to the complaint, but stated that he would not consent to any extension of time to respond to the motion for a preliminary injunction.

4. The defendants respectfully request that the Court extend the date by which responses are due to both of the plaintiff's filings to and including March 8, 2019. Such an extension will allow the defendants' counsel adequate time to prepare appropriate responses to a complaint and motion raising complicated and important issues.

WHEREFORE, the defendants respectfully request that the Court grant this motion and allow the defendants to file their responses to the plaintiff's complaint and motion for a preliminary injunction on or before March 8, 2019.

Respectfully Submitted:

Brian E. Frosh
Attorney General of Maryland

/s/
Kathleen A. Ellis
Assistant Attorney General
Federal Bar No. 04204
Maryland Department of
Suite 302, 300 West Preston Street
Baltimore, Maryland 21201
(410) 767-1867 (voice)
(410) 333-7894 (facsimile)
kathleen.ellis@maryland.gov

February 4, 2019

Attorneys for Defendants